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August 16, 2013

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

**Re: Ex Parte Notice - In the Matter of Rural Call Completion, WC
Docket No. 13-39**

Dear Ms. Dortch:

On August 14, 2013, the undersigned and John Harrington of Neutral Tandem, Inc. d/b/a Inteliquent ("Inteliquent") met with Priscilla Delgado Argeris, Legal Advisor to Commissioner Rosenworcel. We also met with Rebekah Goodheart, Legal Advisor to Commissioner Clyburn; Margaret Dailey of the Enforcement Bureau; and William Dever, Gregory Kwan, Richard Hovey, Steven Rowings, and Carol Simpson of the Wireline Competition Bureau regarding the Commission's Notice of Proposed Rulemaking in the above-captioned proceeding.

During the meetings, we discussed the attached PowerPoint presentation. Inteliquent emphasized that call completion is a serious problem in both rural and non-rural areas that results from the practices of both originating carriers and certain intermediate carriers. Inteliquent expressed its support for the Commission's data collection proposal, which will allow the FCC to track performance and identify the actors who are contributing to call completion problems. We expressed support for the "two hop" safe harbor for originating carriers. We also expressed support for imposing data collection obligations directly on intermediate carriers, provided that the Commission adopts a "one hop" safe harbor for intermediate carriers, which dovetails with the proposed "two hop" safe harbor for originating carriers. We also suggested certain limited clarifications to the proposed rules as described in more detail in the attached presentation.

Please do not hesitate to contact the undersigned with any questions.

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Respectfully Submitted,

/electronically signed/
Ronald W. Del Sesto, Jr.

cc: Priscilla Delgado Argeris (FCC)
Rebekah Goodheart (FCC)
Margaret Dailey (FCC)
William Dever (FCC)
Gregory Kwan (FCC)
Richard Hovey (FCC)
Steven Rowings (FCC)
Carol Simpson (FCC)
John Harrington (Inteliquent)

Attachment



FCC Presentation: Rural Call Completion NPRM

August 14, 2013



Inteliquent (f/k/a Neutral Tandem)

- Leading nationwide provider of intermediate telecommunications service
- Provides voice service in all but three LATAs nationwide and in Puerto Rico
- Directly connected to all 3 RBOCs, every major wireless provider & facilities-based CLEC, and all but 1 MSO
 - Delivers traffic directly to more than 2200 competitive carrier switches and over 350 RBOC/ILEC tandems
 - “On-net” footprint of more than 575,000,000 telephone numbers (TNs).
 - “On-net” figure does not include connection to RBOC/ILEC TNs reachable via RBOC/ILEC tandem.

Call Completion is a Serious Problem

- Problem exists in both rural and non-rural areas
- Results from practices of both originating carriers and certain intermediate carriers
 - Originating Carriers – “Least Cost Routing” or “LCR” engines often emphasize price as primary driver for routing decisions
 - Certain intermediate carriers – Propose pricing for other intermediate carriers’ on-net footprint as part of their LCR offering to originating carriers
 - “Daisy Chain” effect – Multiple intermediate carriers re-selling other intermediate carriers’ on-net footprints, resulting in looping when LCR updates are not passed through
 - Other intermediate carriers engage in price arbitrage

Proposals and Safe Harbors are Sound

- Data collection will allow Commission to track performance and identify bad actors
- Consider identification of specific intermediate carriers as part of data collection
 - Give originating carriers greater incentive to actively manage specific intermediate carriers
- “Two hop” safe harbor for originating carriers is key
 - Strongly encourages originating carriers to avoid LCR decisions that risk “daisy chain”
 - “Two hop” safe harbor is easier, cleaner way for originating carriers to ensure compliance and call completion quality

Suggestions

- Commission should consider extending data collection requirements to intermediate carriers, provided that Commission also adopts appropriate safe harbor
 - (1) if intermediate carrier is first in chain, they only deliver traffic to second intermediate carrier bound for the second carrier's on-net footprint;
 - (2) if intermediate carrier is second in chain, they only deliver traffic to their own on-net footprint
- “One hop” intermediate carrier safe harbor dovetails perfectly with “two hop” originating carrier safe harbor
 - Reinforces that no more than two intermediate carriers are in the call flow – best way to increase call completion

Suggestions (cont'd)

- Terminating tandem should not count as separate “hop” in the chain
 - Rural carriers often subtend aggregating tandem
 - No practical way to direct connect to every rural end office
- Affiliates should count as one carrier in the chain
- Allow one additional carrier in the chain when upstream carrier cannot take back a call that cannot otherwise be completed
 - Inteliquent agrees with ATIS that intermediate carriers should send a call back upstream if the call cannot be completed
 - Some upstream carriers cannot take back calls / cause codes
 - Allowing intermediate carriers to “overflow” call in that situation prevents the call from dropping and enhances call completion